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Attorney for Plaintiffs James Brady,
 Travis Call, Sarah Cavanagh,
 Julia Longenecker, Pedro Noyola &
 Christopher Sulit

IN THE UNITED STATES DISTRICT COURT

THE NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO

JAMES BRADY, TRAVIS CALL,
 SARAH CAVANAGH, JULIA
 LONGENECKER, PEDRO NOYOLA
 and CHRISTOPHER SULIT, individually
 and on behalf of all others similarly
 situated,

Plaintiffs,

vs.

DELOITTE & TOUCHE LLP, a limited
 liability partnership; DELOITTE TAX
 LLP; and DOES 1-10, inclusive,

Defendants.

CASE NO.: C-08-00177 SI

**DECLARATION IN SUPPORT OF
 REQUEST RE: CONTINUANCE
 OF CASE MANAGEMENT
 CONFERENCE DATE**

Milstein, Adelman & Kreger, LLP
 2800 Donald Douglas Loop North
 Santa Monica, CA 90405

1 Representative Plaintiffs JAMES BRADY, TRAVIS CALL, SARAH
2 CAVANAGH, JULIA LONGENECKER, PEDRO NOYOLA and CHRISTOPHER
3 SULIT ("Plaintiffs"), request as follows:

4 1. I am an attorney admitted to practice before all courts in the State of
5 California and I am a senior associate of the law firm of Milstein, Adelman, & Kreger
6 LLP, counsel of record for Plaintiffs ("Plaintiffs") in this action. I make this
7 Declaration from my own personal knowledge and, if called upon, would and could
8 competently testify to the following matters.

9 2. The initial complaint in this case was filed herein on January 10, 2008.

10 3. The Court set an Initial Case Management Conference for April 18,
11 2008.

12 4. Plaintiffs filed a first amended complaint on February 8, 2008.

13 5. Plaintiffs did not receive an amended summons until on or about
14 February 19, 2008.

15 6. Plaintiffs then attempted to serve Defendants in the state of California on
16 February 29, 2008, but service was rejected.

17 7. Plaintiffs then served Defendants by mail on March 24, 2008.

18 8. Currently, the parties are required to meet and confer regarding initial
19 disclosures, early settlement, ADR process selection and a discovery plan by March
20 28, 2008.

21 9. In addition, the parties are required to file a Rule 26(f) Report, complete
22 initial disclosures or state objections in the Rule 26(f) Report and file a Joint Case
23 Management Statement by April 11, 2008.

24 10. Plaintiffs have not been notified of the identify of Defendants' counsel in
25 this action and will not likely learn the identity of Defendants' counsel prior to March
26 28, 2008, the last day to meet and confer, and perhaps not prior to April 11, 2008, the
27 last day to file a Rule 26(f) Report and a Joint Case Management Statement.

1 11. Accordingly, maintaining the current schedule as described above would
2 likely preclude the parties from fully and productively complying with their
3 procedural obligations described above since Plaintiffs' counsel cannot meet and
4 confer with Defendants' counsel until learning the identity of Defendants' counsel.

5 12. Undoubtedly, the case management conference will be far more
6 productive if the parties have had the opportunity to fully meet and confer about all
7 necessary issues prior to the conference.

8 13. Thus, Plaintiffs request that in order to allow sufficient time for the
9 parties to meet and confer and fulfill their other procedural obligations described
10 above, that the Initial Case Management Conference presently set for April 18, 2008
11 be continued a short amount of time to on or after May 16, 2008 at the same time and
12 location.

13 I declare under penalty of perjury under the laws of the State of California that
14 the foregoing is true and correct. Executed this 25th day of March, 2008, in Santa
15 Monica, California.

16 /s/ WILLIAM A. BAIRD

17 WILLIAM A. BAIRD
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